

REMARKS

Claims 1-18 were examined. Claims 1-5 are allowed. Claims 6, 11 and 13-16 are rejected. Claims 7-10, 12, 17-18 are objected to as allowable if rewritten in independent form. Claims 19 and 20 have been added and are supported at least by claims 1, 6, and 15. Applicants amend claim 7 to be in independent form. Applicants amend claims 6, 7, and 15. Applicants assert that no new matter is added herein as amendments to claim 6 and 15 are supported at least by Figures 2-3 and paragraphs 16-18 of the application as filed. Applicants respectfully request reconsideration of claims 6, 11, and 13-16 as amended, in view of at least the following remarks.

I. Claims Rejected Under 35 U.S.C. § 102

The Patent Office rejects claims 6, 11, 13, and 15-16 under 35 U.S.C § 102(b) as being anticipated by U.S. Patent No. 7,023,685 issued to Fujiyama et al. (Fujiyama). It is axiomatic that to be anticipated every limitation of a claim must be disclosed in a single reference.

Applicants respectfully disagree with the rejection above and submit that independent claims 6 and 15, as amended, are patentable over the cited reference for at least the reason that the reference does not disclose an array capacitor underneath an integrated circuit and having openings to enable pins from an integrated circuit package to pass through as required by amended claims 6 and 15.

Fujiyama describes sheet capacitors 5, 21, 31 having a capacitor element 21 disposed in the center of sheets 16 and 17 (see Figures 1-2 and 4-9). However, the Patent Office has not identified and Applicants are unable to find any teaching or suggestion in Fujiyama of an array capacitor underneath an integrated circuit and having openings to enable pins from the integrated circuit package to pass through, as required by claims 6 and 15. Hence, for at least this reason, Applicants respectfully request the Patent Office withdraw the rejection above.

Any dependent claims not mentioned above are submitted as not being anticipated or obvious for at least the same reasons given above in support of their base claims.

II. Claims Rejected Under 35 U.S.C. § 103

The Patent Office rejects claim 14 under 35 U.S.C. § 103(a) as being unpatentable over Fujiyama in view of U.S. Patent No. 5,621,245 to Agatstein et al. (Agatstein) and U.S. Patent No. 5,625,228 to Rogren (Rogren). To render a claim obvious, all limitations of the claim must be taught or suggested by at least one properly combined reference.

Applicants respectfully disagree for at least the reason that claim 14 depends from claim 6. Thus, the arguments above with respect to Fujiyama apply here as well. In addition, Agatstein fails to cure the deficiencies of Fujiyama. Agatstein describes IC package 10 having IC die 12 mounted thereon (see col. 2, lines 57-65 and Figure 2). However, the Patent Office has not identified and Applicants are unable to find any teaching or suggestion in Agatstein of the array capacitor limitations of claim 6 noted above.

Similarly, Rogren teaches a semiconductor device mounted directly on a thermally conductive case (see Abstract). However, the Patent Office has not identified and Applicants are unable to find any teaching or suggestion in Rogren of the array capacitor limitations of amended claim 6 noted above.

Hence, since none of Fujiyama, Agatstein, or Rogren teach or suggest the above noted limitations of claim 6, Applicants respectfully request the Patent Office withdraw the rejection above of claim 14.

III. Allowable Subject Matter

Applicants note with appreciation that the Patent Office has indicated that claims 1-5 are allowed over the prior art of record, and that claims 7-10, 12 and 17-18 are objected to as allowable if rewritten in independent form. Applicants also note with appreciation the Patent Office's statement of reasons for allowable subject matter. Finally, Applicants note that claim 7 has been rewritten in independent form.

IV. Additional Claims 19 and 20

Applicants note that additional claims 19 and 20 include subject matter identified as allowable in the reasons for allowable subject matter. Specifically, those claims include a capacitor having a plurality of first conductive layers and a plurality of second conductive layers interlinked with the first conductive layers. Hence, Applicants respectfully request the Patent Office allow claims 19 and 20.

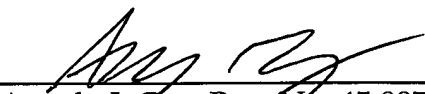
CONCLUSION

In view of the foregoing, it is believed that all claims now are now in condition for allowance and such action is earnestly solicited at the earliest possible date. If there are any additional fees due in connection with the filing of this response, please charge those fees to our Deposit Account No. 02-2666.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

Dated: Oct. 27, 2006



Angelo J. Gaz, Reg. No. 45,907

12400 Wilshire Blvd.
Seventh Floor
Los Angeles, California 90025
(310) 207-3800

CERTIFICATE OF MAILING:

I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail in an envelope addressed to: Mail Stop Amendment, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450.



Suzanne Johnston

10/27/06

Date